


Exhibit 23

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VENEZUELA SANCTIONS

1124. I am a party seeking to enforce bondholder rights to the shares of CITGO Holding serving as collateral for the Petróleos de Venezuela, S.A. (PdVSA) 2020 8.5 percent bond, pending the outcome of ongoing litigation. How can I preserve or enforce my bondholder rights consistent with the Venezuela Sanctions Regulations, [31 CFR part 591](#) (VSR)?

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Search FAQs

OFAC will not take enforcement action against any person for taking steps to preserve the ability to enforce bondholder rights to the CITGO shares serving as collateral for the PdVSA 2020 8.5 percent bond (see also OFAC Frequently Asked Question (FAQ) [1123](#); [General License 42](#) and OFAC FAQ [1125](#)). This non-enforcement policy governs OFAC sanctions only and does not relieve persons of obligations to comply with any other applicable regulatory requirements, reviews, or approvals that may be necessary to finalize any sale. As noted in FAQ [1125](#), parties that have negotiated a settlement agreement pursuant to [General License 42](#) will still need to seek a specific license for entry into that agreement.

May 1, 2023

Similar FAQs

[1123.](#) In *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, 17-mc-00151 (D. Del.), the U.S. District Court for the District of Delaware has entered a Sale Procedures Order with respect to certain shares in PDV Holding (PDVH) to satisfy a U.S. district court judgment confirming an arbitral award against Venezuela. May persons participate in or comply with steps relating to a judicial sale of such shares?

[595.](#) What does Venezuela-related General License 5K authorize?

[1125.](#) I am a creditor of the Government of Venezuela, Petróleos de Venezuela, S.A. (PdVSA), or a PdVSA subsidiary. Do I need an OFAC license to negotiate the settlement of claims related to assets of the Government of Venezuela or PdVSA?

808. Do I need a specific license from OFAC to file a suit in U.S. court against a person designated or blocked pursuant to Venezuela-related sanctions? Does a U.S. court, or its personnel, need a specific license from OFAC to hear such a case?

547. Can U.S. Persons participate in meetings about restructuring outstanding Venezuelan and PDVSA debt?

650. What is the expected level of due diligence associated with ensuring that transfers or divestment of debt (and, in the case of Venezuela-related General License 9B, equity) in certain blocked persons (in the case of General License 9B) or the Government of Venezuela (in the case of General License 3C) are consistent with the terms of General Licenses 3C and 9B?



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